(Rev. 01-31-2003)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 12/13/2005

To: Washington Field **Attn:** SSA [redacted]

From: Washington Field
CR-13 / NVRA
Contact: SA [redacted]

Approved By: [redacted]

Drafted By: [redacted]

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Case ID #: 196D-WF-230133 (Pending)

Title: [redacted]

COLUMBIA LIGHTHOUSE FOR THE BLIND - VICTIM (CLB)
FBW; MF

Synopsis: To document contact with representatives from White & Case LLP, attorneys for Columbia Lighthouse for the Blind.

Enclosure(s): Binder containing documents provided by White & Case, and a CD ROM copy of the documents.

Details: On December 13, 2005, the writer and Assistant United States Attorney [redacted] met with representatives from White & Case LLP at the United States Attorney's office in Washington, DC. Attending the meeting for White & Case were [redacted] attorneys, and [redacted] Legal Assistant. The purpose of the meeting was for White & Case to provide information to the Federal Bureau of Investigation (FBI) regarding their internal investigation of [redacted] employment at the Columbia Lighthouse for the Blind (CLB).

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01/06/06

S: [redacted]

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Following the meeting, White & Case provided one binder and one CD ROM disc, containing documents related to White & Case's full investigation of [redacted] employment at CLB. The documents from White & Case will be placed in a 1A envelope and placed in the substantive case file.

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FD-302 (Rev. 3-10-82)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 2/12/93

[redacted] DOB, [redacted], Los Angeles County Transportation Commission (LACTC), met with Special Agents [redacted] DOT-OIG at the Los Angeles office of the Federal Bureau of Investigation. [redacted] provided the following information relating to Los Angeles County Transportation Committee (LACTC) employees and former employees:

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[redacted] is allegedly aware of several contracts where money was released without invoices or contracts in place. [redacted] is knowledgeable of a DMR contract, initial contract amount of $1.7 million award. Within one year several change orders were issued bringing the total award to $7.1 million. The change orders were allegedly performed without the knowledge of the Board at LACTC. [redacted] is also able to provide information relating to an off-shore account in the Grand Cayman Island established by LACTC and a $500,000.00 release of funds to the account by the law firm of White and Case, Washington, D.C. [redacted] can be contacted through [redacted] at [redacted]

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[redacted] is allegedly knowledgeable of illegal payment release on contracts ordered by [redacted] and [redacted] supervisor. [redacted] is knowledgeable of contracts initially approved under $50,000.000 and subsequent change orders made to dramatically increase contract awards. [redacted] can be reached at [redacted]

[redacted] currently [redacted] allegedly aware of funding releases on contracts prior to approval. [redacted] can be reached at [redacted]

[redacted]

Investigation on 2/9/93 at Los Angeles, California File # 207H-LA-145667

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by SA [redacted] Date dictated 2/9/93

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

[redacted] is allegedly knowledgeable of payments relating to construction projects. PAYMENTS were made prior to contracts in place and several change orders made resulting in additional funds which were not approved by LACTC board. [redacted] can be reached at [redacted] and his residence [redacted] b6 b7C

[redacted] allegedly is knowledgeable of change order excesses relating to various contracts; TUTOR-SALIBA over-billing LACTC for concrete poured by Accu-Crete. [redacted] met with [redacted] relating to several issues of TUTOR-SALIBA. [redacted] has also met with [redacted] the new MTA (Metro Transit Authority). Several of [redacted] friends have allegedly received contracts i.e. [redacted] Cordoba Company, Mis Software Contract and Sub-contracts. [redacted] allegedly made a $3,000.00 compaign contribution to [redacted] prior to receipt of contract.

[redacted] under [redacted] now [redacted] is allegedly knowledgeable of the LACTC off-shore account involving the lease back of the blue line cars. [redacted] allegedly ordered $500,000.00 to be released from LACTC and wired to the law firm of White and Case and later deposited to the off-shore accounts in the Grand Cayman Islands. b6 b7C

[redacted] now [redacted] is allegedly aware of instances where funds were released without contracts in place.

[redacted] under the supervision of [redacted] Handled accounts payable prior to the time of [redacted] allegedly aware of missing documentation, invoicing concerning funds released without contracts in place. b6 b7C

[redacted] After leaving [redacted] set up KARO Enterprises and was awarded a $3.5 million contract for Labor Compliance, EEO. [redacted] was the

 b6 b7C

recipient of a $14,000 contract which later totaled $4.1 million after change orders.

[redacted]. [redacted] allegedly steered several contracts to friends including [redacted] contract of $3.5 million and Hi-point Schaer Company contract of $4.1 million. [redacted] was allegedly involved in moving money for the off-shore account in the Grand Cayman Islands. [redacted] was the [redacted] under [redacted]

[redacted] for [redacted]. b6 b7C DEFOOR allegedly aware of a check made payable to [redacted] in the amount of $18,000.00. [redacted] is also aware of the Mis Software Contract for $1.1 million. [redacted] can be reached at [redacted]

[redacted] previously, [redacted] allegedly directed [redacted] to release funds without contracts in place.

[redacted] is allegedly knowledgeable of [redacted] steering contracts to [redacted] and Hi-Point Schaer Company. [redacted] is close to [redacted] b6 b7C can be reached at [redacted].

[redacted] currently at [redacted] allegedly falsified documents in Contract Compliance Department, LACTC.

[redacted] Allegedly ghost-employee while attending USC School of Law. Allegedly supplying cocaine to several LACTC staffers.

[redacted] b6 b7C secured a contract with a Canadian firm, DMR, for $7 million. The contract was allegedly awarded without a competitive bid in 1990. This contract was not reviewed by the accounting office until after the effective date. The contract was for the Management Information System (MIS).

[redacted] Allegedly knowledgeable of [redacted] approving DBE/WBE when not eligible

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i.e. [redacted] knowledgeable of the decertification of CII; knowledgeable of [redacted] $3.5 million contract at KARO. [redacted] may be able to provide additional names of individuals who may be able to provide information. [redacted] can be reached at her residence [redacted].

[redacted] allegedly knowledgeable of [redacted] activities and believes that [redacted] may be "dirty". [redacted] is a friend of [redacted] and [redacted] can be reached at [redacted]

[redacted] b6 b7C
allegedly knowledgeable of [redacted] transactions. [redacted] is allegedly fearful of retaliation if she were to cooperate.

[redacted] allegedly knowledgeable of [redacted] falsified travel vouchers. Friend of [redacted]

FD-302 (Rev. 3-10-82)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 2/12/93

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Investigation on 2/9/93 at Los Angeles, California File # 207H-LA-145667 B-12 b6 b7C

by SA [redacted] Date dictated 2/9/93

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[redacted] allegedly knowledgeable of [redacted] transactions. [redacted] is allegedly fearful of retaliation if she were to cooperate. b6 b7C

[redacted] allegedly knowledgeable of [redacted] falsified travel vouchers. Friend of [redacted]

She insisted that her contacts with Senator WILLIAMS have been strictly social in nature. She said she never asked, nor has Senator WILLIAMS ever volunteered to use his influence in any of his business ventures.

FD-302 (REV. 3-8-77)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 10/24/80

[redacted] telephone number [redacted] was interviewed at the offices of White and Case, 280 Park Avenue, New York, New York, and advised of the identity of the interviewing Agents. She furnished the following information. b6 b7C

[redacted] CHARLES ENGLEHARDT who was the principal stockholder of Englehardt Metals until his death in 1969. She was on the Board of Directors of the company until 1979. Her company deals in the processing and manufacture of jewelery from precious metal as well as the sale of precious metals. Her company is also diversified doing business under subsidiary companies in the sale and manufacture of asbestos.

[redacted] said that her relationship with Senator HARRISON A. WILLIAMS was strictly social. She said to her knowledge neither she or or her late husband ever discussed business with WILLIAMS to use his influence on her behalf for business reasons, nor did WILLIAMS ever volunteer to use his influence. b6 b7C

She said that she did not become acquainted with [redacted] until [redacted] Senator WILLIAMS approximately four years ago. She revealed that Senator WILLIAMS called the day before he got married and informed that his wedding would take place the following day at the Raritan Tavern. [redacted] at that point volunteered her estate at [redacted] as the site of the wedding. She said that some of the staff from the Raritan Tavern, as well as her own estate staff, was used for the wedding. b6 b7C

She stated that she also owns an estate at [redacted] She said, to the best of her knowledge, Senator WILLIAMS was invited to her Florida estate twice. The most recent visit was in the winter of 1980 when he came with [redacted] for a few days rest. She stated she paid for WILLIAMS' and [redacted] round trip airfare tickets which is customary when she invites guests to her estate. b6 b7C

[redacted]

Investigation on 10/17/80 at New York, New York File # BQ194C-127-Sub B

by [redacted] SA [redacted] SA Date dictated 10/21/80 58 I

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FD-350 (Rev. 5-8-81)

KNICKERBOCKER NEWS
ALBANY, N.Y.

(Indicate page, name of newspaper, city and state.)

Date: 1/27/87
RED HEAD

Character:
or
Classification: 194-C
Submitting Office: ALBANY

Indexing:

Whalen law firm name appears on deed

First American Bank transaction is part of U.S. scrutiny of Albany tax handling

By Brad Kelly
The Knickerbocker News

Albany Mayor Thomas M. Whalen III's law firm directly handled some of the legal paper work involving a land sale that has come under scrutiny by the FBI and the U.S. attorney's office.

The name of Whalen's law firm at the time of the sale — Cooper Erving & Savage — appears on a 1985 property deed for 246-248 Washington Ave., one of several properties involved in a transfer of assets between Bankers Trust Co. and First American Bank.

The signature of Freling Smith, one of Whalen's law partners, appears as a notary public on the deed, as does a reference to "Cooper, Erving & Savage: Attn. Freling Smith."

This is the first indication that Whalen's law firm was directly involved in the bank transaction, about which he has acknowledged writing a memo recommending against a tax hike for First American.

Federal investigators have subpoenaed city property tax, assessment and treasurer's records, as well as records from First American Bank, according to city and bank officials.

The federal authorities will not even confirm the existence of a probe, but city officials say the bank property transfer is involved in the federal inquiry.

At issue are several Albany properties acquired by the bank when it bought the Capital District operations of Bankers Trust Co. in October, 1984. One of the documents turned over to investigators is a 1985 memo in which Whalen wrote to former city tax assessor Bruce McDonald recommending against increasing tax assessments on those properties.

When the memo was written, Whalen was mayor and his law firm represented First American Bank. The firm continues to represent First American, which also handles the city's payroll and some capital fund accounts.

Richard Lindstrom, executive vice president of First American, said Monday that Cooper Erving & Savage "may have handled the filing of the deed," but "they didn't handle the sale of any of the buildings."

He said the transfer of assets from one bank to another was handled mainly by Bankers Trust Co. attorneys and the New York City firm of White & Case.

Officials from White & Case declined to discuss what role, if any, Cooper Erving & Savage played in the transfer of assets.

Smith was unavailable for comment Monday.

The name of White & Case is denoted on the property deeds of at least three other properties acquired from Bankers Trust Co. by First American Bank, including 35 State St., 135 South Pearl St. and 403-407 Delaware Ave.

One of Whalen's law partners, Terrance P. Christenson, said the firm "helped out as needed" with the transfer of assets. "It was a highly sophisticated transaction ... handled principally out of New York City by New York City counsel," he said.

City officials have argued the assessments on the First American properties were not increased because the price paid for the real estate was not based solely on property values.

In addition, though sale of the bank properties is listed on the deeds as taking place Oct. 1, 1984, the deeds were not officially recorded until March 21, 1985, nearly six months later.

One of the reasons purchasers of property delay officially registering their purchase is to delay notifying the city of the sale, which triggers an automatic reassessment of the property's value. This almost always results in a rise in the property owner's tax bill.

"The advantage is, it's not considered a sale, and we don't review something that's not a sale," said city Assessor Keith McDonald.

194-C-187-58

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FBI/DOJ

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 02/05/2009

[redacted] was telephonically contacted by Federal Bureau of Investigation Special Agent [redacted]. After being advised of the identity of the interviewing agent and the nature of the interview, [redacted] provided the following information:

[redacted] has spent over fifteen years in the foreign service with duty stations in Berlin, Germany and in Taiwan. [redacted] used his foreign service and contacts he had made over time to become in international business relations and consulting.

[redacted] was first introduced to [redacted] by [redacted] of BIOCORP ENVIRONMENTAL. [redacted] had some legal issues come up in Missouri or Kansas and [redacted] ended that relationship.) [redacted] was the [redacted] of a family owned Indian company called ZOOM. ZOOM's primary business was focused on building things like bridges and roads in India. ZOOM is based in Mumbai and has substantial assets. [redacted] wanted to branch out into other areas and came to the United States to pursue potential business opportunities.

[redacted] offered to consult for ZOOM in September 2003. Over the next three months, [redacted] developed a plan to assist ZOOM meet their U.S. objectives. In January 2004, [redacted] met with [redacted] and [redacted] was the [redacted] of SOIL SAVERS. [redacted] does not know how [redacted] and [redacted] initially met each other, however, he understood that [redacted] was interested in investing in SOIL SAVERS (an environmental company).

[redacted] was very open and receptive to [redacted] due-diligence into SOIL SAVERS and the relationship between the two companies was off to a fast start. Since [redacted] only had experience in running his company in Texas, ZOOM and [redacted] started looking for someone with more experience, so they could expand internationally. [redacted] appointed [redacted] to be the [redacted] in order to assist in the transaction between ZOOM and SOIL SAVERS. [redacted] gave [redacted] and [redacted] a budget to work with.

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Investigation on 01/30/2009 at Dallas, Texas (telephonically)

File # 318E-DL-102964-187 Date dictated 02/05/2009

by SA [redacted]

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DL-102964-187

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By February 2004, [redacted] had given [redacted] the go ahead to move forward with the ZOOM and SOIL SAVERS partnership. [redacted] began bringing in people in from his own network to perform due-diligence on SOIL SAVERS. [redacted] was a lawyer from the firm of WHITE AND CASE who worked on the licensing and sales agreement between the two companies. HEIDRICH AND STRUGGLES was an executive search firm that was hired to find a suitable [redacted] to replace [redacted]. (HEIDRICH AND STRUGGLES' principle offices are in Chicago, Illinois and [redacted] was in charge of finding the new [redacted] [redacted] (no relation to [redacted]) was an accountant at the firm of BOSTEN AND ASSOCIATES.

Around July 2004, WHITE AND CASE had become very involved in the transaction, performed the legal work, and needed a financial audit of SOIL SAVERS. WHITE AND CASE hired [redacted] of ROWLAND AND JOHNSON to perform forensic accounting. [redacted] is located in Delaware. b6 b7C

During the due diligence period, [redacted] was in Texas on several occasions and gave SOIL SAVERS a clean bill of health. b6 b7C

WHITE AND CASE had a pretty high price tag for their due-diligence because of potential liability for the licensing and asset sales transaction between ZOOM and SOIL SAVERS because ZOOM only has liability for what it takes on at that time. WHITE AND CASE did not care about the investors because they were recognized in the schedule as represented by [redacted]. There were no provisions in the agreement that addressed royalties owed to investors. The general attitude about profits was that payments to investors would be kept at the local level and only what was left over would go to ZOOM. ZOOM claimed no responsibility to the investors. ([redacted] could not provide any insight or explanation of this logic of ZOOM agreeing that SOIL SAVERS investors be paid before they were.) b6 b7C

After the due-diligence period concluded, the deal between SOIL SAVERS and ZOOM closed. However, in late 2004 [redacted] began to notice some worrisome things from ZOOM. ZOOM did not fund SOIL SAVERS or pay their bills according to schedule. ZOOM also failed to pay HEIDRICH AND STRUGGLES, so [redacted] terminated the new [redacted] search. [redacted] became increasingly focused on spending his time with the acquisition of OVERTURE in New York, New York. [redacted] refused to work on this deal unless the SOIL SAVERS situation was addressed. [redacted] was interested in being in charge of paying SOIL SAVERS on behalf of ZOOM. b6 b7C

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[redacted] was involved with meeting [redacted] in Dallas, Texas to keep an eye on SOIL SAVERS until the new [redacted] was found. [redacted] had a history with the World Bank and had developed deals and infrastructure with them. [redacted] tolerated [redacted], however, considered him to be a fool. The SOIL SAVERS staff thought [redacted] was a fool as well.

[redacted] believed that there needed to be oversight in Dallas and hired [redacted] of Delaware as an interim [redacted] [redacted] and [redacted] butted heads over things and [redacted] eventually quit. [redacted] informed [redacted] that there was something that was not right in Texas. [redacted] did not have a relationship with [redacted].

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During the first three quarters of 2005, [redacted] could not spend all of his time working on SOIL SAVERS because he had been working on the OVERTURE deal with [redacted]. (ZOOM eventually defaulted on the OVERTURE deal.) He was running three offices and had made several trips to and from Asia. [redacted] was in New York managing the financials of SOIL SAVERS, LLC (ZOOM's U.S. d.b.a. for SOIL SAVERS) and working with [redacted] on strategic issues.

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[redacted] came to Texas two or three times and made two distinct observations about the SOIL SAVERS operation. First of all, [redacted] projections were not materializing and could not get funding. Secondly, every time ZOOM promised money they would never send it. This caused finger-pointing between JOHNSON and ZOOM. The relationship between the two companies was becoming toxic.

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Around May 2005, [redacted] was considering quitting because ZOOM was not keeping their commitments. [redacted] became more involved with SOIL SAVERS around this time. In August 2005, [redacted] had a major confrontation with [redacted] because employees of SOIL SAVERS were going out on jobs without any insurance. This infuriated [redacted] because he could have been liable if anything happened.

At this time, WHITE AND CASE had yet to be paid by ZOOM for their work and the collections process had been started. WHITE AND CASE wanted [redacted] to help them find [redacted] to discuss the bill. [redacted] had set up meetings between [redacted] and WHITE AND CASE, however, he never showed up to them. [redacted] never gave and excuse for missing the meetings and became very transparent. [redacted] quit as the ZOOM (SOIL SAVERS, LLC) [redacted], however, still maintained some responsibilities with SOIL SAVERS and OVERTURE.

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[redacted] initially thought that ZOOM was the party in the wrong and he did not want to bail out on SOIL SAVERS. [redacted] resigned from SOIL SAVERS on November 5, 2005 because ZOOM came in with a new management team. The new [redacted] was [redacted]. Other managers were [redacted] and [redacted] had a chemistry background. A new agreement between SOIL SAVERS and ZOOM was drafted. New bank accounts were opened at Wachovia and [redacted] controlled the money from India. [redacted] had very little contact with ZOOM and/or SOIL SAVERS from that point forward.

The new agreement fell through and a third (unsuccessful as well) was drafted in mid-2006. ZOOM essentially admitted that they had failed.

[redacted] was also to blame for the failure of SOIL SAVERS. b6 b7C

[redacted] noticed a paradigm shift in [redacted] methods and thinking. A specific example is regarding SOIL SAVERS patents. Initially, the company had patents, however, the applications went inactive because they had not been paid for (as discovered by WHITE AND CASE). [redacted] then needed ZOOM to make things work and finally needed a new [redacted] with international patent filing experience. [redacted] knew that the SOIL SAVERS patent portfolio needed to be cleaned up. [redacted] then stated that the SOIL SAVERS technology would be kept as trade secrets and kept the actual process out of site in the vans they used for their jobs.

WHITE AND CASE gave the same legal treatment to [redacted] as they did for [redacted] b6 b7C [redacted] was a quirky guy and the inventor of the technologies. [redacted] certified that the information he gave to WHITE AND CASE was true and correct. [redacted] and [redacted] did not get along with each other.

Schedule 5.1 of the SOIL SAVERS/ZOOM agreement has a complete investor list. (SA [redacted] is in possession of this document, however, the investor list is absent from schedule 5.1. [redacted] refuses to transmit a copy of the schedule in the document to SA [redacted] because he believes that it is not his place to do so since WHITE AND CASE owns it.) b6 b7C

[redacted] now believes that the sale of SOIL SAVERS to ZOOM victimized the investors. b6 b7C

[redacted] never made the connection between SOIL SAVERS and FUEL FX.

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[redacted] has never heard of RENEW TECHNOLOGY or the evolution from ICTK to ENVIRONMENTAL MANAGEMENT (through BIG BLUE, SOIL SAVERS, and RENEW).

[redacted] believes that the investors were dually and correctly franchised in the SOIL SAVERS, LLC deal and that ZOOM's failure to deliver led to disappointment and injury to [redacted]

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[redacted] discovered over the course of time that the technology was not as cutting edge as it had been promoted.

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 02/05/2009

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[redacted] was first introduced to [redacted] by [redacted] of BIOCORP ENVIRONMENTAL. ([redacted] had some legal issues come up in Missouri or Kansas and [redacted] ended that relationship.) [redacted] was the [redacted] of a family owned Indian company called ZOOM. ZOOM's primary business was focused on building things like bridges and roads in India. ZOOM is based in Mumbai and has substantial assets. [redacted] wanted to branch out into other areas and came to the United States to pursue potential business opportunities. b6 b7C

[redacted] offered to consult for ZOOM in September 2003. Over the next three months, [redacted] developed a plan to assist ZOOM meet their U.S. objectives. In January 2004, [redacted] met with [redacted] and [redacted], [redacted] was the [redacted] of SOIL SAVERS. [redacted] does not know how [redacted] and [redacted] initially met each other, however, he understood that [redacted] was interested in investing in SOIL SAVERS (an environmental company). b6 b7C

[redacted] was very open and receptive to [redacted] due-diligence into SOIL SAVERS and the relationship between the two companies was off to a fast start. Since [redacted] only had experience in running his company in Texas, ZOOM and [redacted] started looking for someone with more experience, so they could expand internationally. [redacted] appointed [redacted] to be the [redacted] operations in order to assist in the transaction between ZOOM and SOIL SAVERS. [redacted] gave [redacted] and [redacted] a budget to work with. b6 b7C

Investigation on 01/30/2009 at Dallas, Texas (telephonically)

File # 318E-DL-102964 -127 Date dictated 02/05/2009

by SA [redacted] b6 b7C

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 b6 b7C

By February 2004, [redacted] had given [redacted] the go ahead to move forward with the ZOOM and SOIL SAVERS partnership. [redacted] began bringing in people in from his own network to perform due-diligence on SOIL SAVERS. [redacted] was a lawyer from the firm of WHITE AND CASE who worked on the licensing and sales agreement between the two companies. HEIDRICH AND STRUGGLES was an executive search firm that was hired to find a suitable [redacted] to replace [redacted]. (HEIDRICH AND STRUGGLES' principle offices are in Chicago, Illinois and [redacted] was in charge of finding the new [redacted]) [redacted] (no relation to [redacted]) was an accountant at the firm of BOSTEN AND ASSOCIATES.

Around July 2004, WHITE AND CASE had become very involved in the transaction, performed the legal work, and needed a financial audit of SOIL SAVERS. WHITE AND CASE hired [redacted] of ROWLAND AND JOHNSON to perform forensic accounting. [redacted] is located in Delaware. b6 b7C

During the due diligence period, [redacted] was in Texas on several occasions and gave SOIL SAVERS a clean bill of health. b6 b7C

WHITE AND CASE had a pretty high price tag for their due-diligence because of potential liability for the licensing and asset sales transaction between ZOOM and SOIL SAVERS because ZOOM only has liability for what it takes on at that time. WHITE AND CASE did not care about the investors because they were recognized in the schedule as represented by [redacted]. There were no provisions in the agreement that addressed royalties owed to investors. The general attitude about profits was that payments to investors would be kept at the local level and only what was left over would go to ZOOM. ZOOM claimed no responsibility to the investors. [redacted] could not provide any insight or explanation of this logic of ZOOM agreeing that SOIL SAVERS investors be paid before they were.) b6 b7C

After the due-diligence period concluded, the deal between SOIL SAVERS and ZOOM closed. However, in late 2004 [redacted] began to notice some worrisome things from ZOOM. ZOOM did not fund SOIL SAVERS or pay their bills according to schedule. ZOOM also failed to pay HEIDRICH AND STRUGGLES, so [redacted] terminated the new [redacted]earch. [redacted] became increasingly focused on spending his time with the acquisition of OVERTURE in New York, New York. [redacted] refused to work on this deal unless the SOIL SAVERS situation was addressed. [redacted] was interested in being in charge of paying SOIL SAVERS on behalf of ZOOM. b6 b7C

 b6 b7C

[redacted] was involved with meeting [redacted] in Dallas, Texas to keep an eye on SOIL SAVERS until the new [redacted] was found. [redacted] had a history with the World Bank and had developed deals and infrastructure with them. [redacted] tolerated [redacted], however, considered him to be a fool. The SOIL SAVERS staff thought [redacted] was a fool as well.

[redacted] believed that there needed to be oversight in Dallas and hired [redacted] of Delaware as an interim [redacted] [redacted] and [redacted] butted heads over things and [redacted] eventually quit. [redacted] informed [redacted] that there was something that was not right in Texas. [redacted] did not have a relationship with [redacted]. b6 b7C

During the first three quarters of 2005, [redacted] could not spend all of his time working on SOIL SAVERS because he had been working on the OVERTURE deal with [redacted] (ZOOM eventually defaulted on the OVERTURE deal.) He was running three offices and had made several trips to and from Asia. [redacted] was in New York managing the financials of SOIL SAVERS, LLC (ZOOM's U.S. d.b.a. for SOIL SAVERS) and working with [redacted] on strategic issues. b6 b7C

[redacted] came to Texas two or three times and made two distinct observations about the SOIL SAVERS operation. First of all, [redacted] projections were not materializing and could not get funding. Secondly, every time ZOOM promised money they would never send it. This caused finger-pointing between JOHNSON and ZOOM. The relationship between the two companies was becoming toxic. b6 b7C

Around May 2005, [redacted] was considering quitting because ZOOM was not keeping their commitments. [redacted] became more involved with SOIL SAVERS around this time. In August 2005, [redacted] had a major confrontation with [redacted] because employees of SOIL SAVERS were going out on jobs without any insurance. This infuriated [redacted] because he could have been liable if anything happened. b6 b7C

At this time, WHITE AND CASE had yet to be paid by ZOOM for their work and the collections process had been started. WHITE AND CASE wanted [redacted] to help them find [redacted] to discuss the bill. [redacted] had set up meetings between [redacted] and WHITE AND CASE, however, he never showed up to them. [redacted] never gave and excuse for missing the meetings and became very transparent. [redacted] quit as the ZOOM (SOIL SAVERS, LLC) [redacted], however, still maintained some responsibilities with SOIL SAVERS and OVERTURE. b6 b7C

b6
b7C

[redacted] initially thought that ZOOM was the party in the wrong and he did not want to bail out on SOIL SAVERS. [redacted] resigned from SOIL SAVERS on November 5, 2005 because ZOOM came in with a new management team. The new [redacted] was [redacted]. Other managers were [redacted] and [redacted]. [redacted] had a chemistry background. A new agreement between SOIL SAVERS and ZOOM was drafted. New bank accounts were opened at Wachovia and [redacted] controlled the money from India. [redacted] had very little contact with ZOOM and/or SOIL SAVERS from that point forward.

The new agreement fell through and a third (unsuccessful as well) was drafted in mid-2006. ZOOM essentially admitted that they had failed.

[redacted] was also to blame for the failure of SOIL SAVERS.

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[redacted] noticed a paradigm shift in [redacted] methods and thinking. A specific example is regarding SOIL SAVERS patents. Initially, the company had patents, however, the applications went inactive because they had not been paid for (as discovered by WHITE AND CASE). [redacted] then needed ZOOM to make things work and finally needed a new [redacted] with international patent filing experience. [redacted] knew that the SOIL SAVERS patent portfolio needed to be cleaned up. [redacted] then stated that the SOIL SAVERS technology would be kept as trade secrets and kept the actual process out of site in the vans they used for their jobs.

WHITE AND CASE gave the same legal treatment to [redacted] as they did for [redacted]. [redacted] was a quirky guy and the inventor of the technologies. [redacted] certified that the information he gave to WHITE AND CASE was true and correct. [redacted] and [redacted] did not get along with each other.

b6
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Schedule 5.1 of the SOIL SAVERS/ZOOM agreement has a complete investor list. (SA [redacted] is in possession of this document, however, the investor list is absent from schedule 5.1. [redacted] refuses to transmit a copy of the schedule in the document to SA [redacted] because he believes that it is not his place to do so since WHITE AND CASE owns it.)

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[redacted] now believes that the sale of SOIL SAVERS to ZOOM victimized the investors.

b6
b7C

[redacted] never made the connection between SOIL SAVERS and FUEL FX.

 b6 b7C

[redacted] has never heard of RENEW TECHNOLOGY or the evolution from ICTK to ENVIRONMENTAL MANAGEMENT (through BIG BLUE, SOIL SAVERS, and RENEW).

[redacted] believes that the investors were dually and correctly franchised in the SOIL SAVERS, LLC deal and that ZOOM's failure to deliver led to disappointment and injury to [redacted]. b6 b7C

[redacted] discovered over the course of time that the technology was not as cutting edge as it had been promoted.

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 7-29-96

[redacted] date of birth [redacted], was telephonically contacted at his place of business at telephone number [redacted] and after being advised as to the identity of the interviewing Agent and the purpose of the interview, provided the following information: b6 b7C

[redacted] is [redacted] in the law firm of BRONSON AND MIGLIACCIO located at 287 Bowman Avenue, Purchase, New York 10577, and has an office telephone of [redacted] advised that he has represented [redacted] for many years, and represented [redacted] in the transaction with [redacted]

[redacted] attended two meetings with [redacted] regarding the IBSA transaction. The first meeting was held in the office of [redacted] at the IBSA office in Stanford, Connecticut. During this meeting, [redacted] did most of the talking although there were others present. [redacted] had a very good presentation and explained the funding process in a very cogent manner. During this meeting, [redacted] never stated specifically that she had personally funded a loan. However, she indicated that IBSA had funded loans in the past, but [redacted] could not recall her ever specifically mentioning [redacted] during this first meeting. When [redacted] and [redacted] asked for references of people who had previously dealt with IBSA, [redacted] referred them to an attorney by the name of [redacted] of a law firm in New York called WHITE AND CASE. [redacted] also referred them to an accounting firm and specifically to an individual by the name of [redacted] who has a telephone number of [redacted] b6 b7C

[redacted] recalls that he specifically telephonically contacted [redacted] of the law firm of WHITE AND CASE. During his conversation, [redacted] vouched for the credibility of [redacted] and indicated that he had represented her for many years. From the tenor of his conversation, [redacted] was led to believe that [redacted] had a professional relationship with [redacted] and had known her for the past ten years. [redacted] did not make any reference to having a personal relationship with [redacted] only indicated that the relationship was professional. b6 b7C

Investigation on 7-22-96 at Miami, Florida Telephone

File # 196A-MM-68568-SUB 302 Date dictated 7-23-96 b6 b7C

SA [redacted] 196a-mm-68568-651

by

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211 [redacted] 02.302

 b6 b7C

On July 23, 1996, [redacted] telephoned Special Agent [redacted] and advised that the person he had spoken with at COOPER's AND LYBRANT was someone by the name of [redacted] who had a telephone number [redacted] stated that he would attempt to locate any records that he may have regarding this transaction.

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[redacted] explained that the reason for the secrecy regarding the transaction was that the matter was somehow or another shrouded in a mystery. It was [redacted] impression that although whatever this trust was doing was legal, it was not something that they would want other people to know about. [redacted] does not recall [redacted] ever mentioning the name [redacted] during the initial meeting.

The accounting firm of COOPERS AND LYBRANT, was the accounting firm that [redacted] gave him as a reference. [redacted] telephonically contacted [redacted] at telephone number [redacted] and spoke to him about IBSA. [redacted] would only say that his firm had been consulted by IBSA regarding some tax matters. There was a question as whether or not the income from these loans would have tax consequences.

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Sometime after the initial meeting, [redacted] accompanied [redacted] to Fort Lauderdale, Florida where they went to the office of IBSA and met with a person by the name of [redacted] Last name unknown (LNU) who ran the Fort Lauderdale office of IBSA. At this meeting, [redacted] signed all the documents regarding this transaction. [redacted] does not recall very much about the specific conversations that he had with [redacted] (LNU) during this meeting. He could only recall that they signed approximately 8 to 10 sets of documents.

[redacted] could recall that the person by the name of [redacted] LNU was of Hispanic descent and made mention to being from [redacted] He also could recall that [redacted] had at one time been in the army. He also recalled [redacted] LNU making a remark that he was something like a counter part of [redacted] in that he ran the IBSA office in Fort Lauderdale, Florida and [redacted] ran the one in Stanford, Connecticut.

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[redacted] does not recall very much about the specifics of this conversation with [redacted] in the Fort Lauderdale office and can not recall if the name [redacted] ever came up. He did recall a statement that if a borrower ever breached confidentiality, that their loan application would be forfeited and that they would never receive their funding. Subsequent to the meeting, for some reason [redacted] was requested to provide a letter stating that he had never contacted anyone in Europe regarding this transaction or IBSA. [redacted] was requested to prepare a letter to that affect which he did and sent it to IBSA.

[redacted] stated that [redacted] was an upstanding person that he had known for many years. b6 b7C

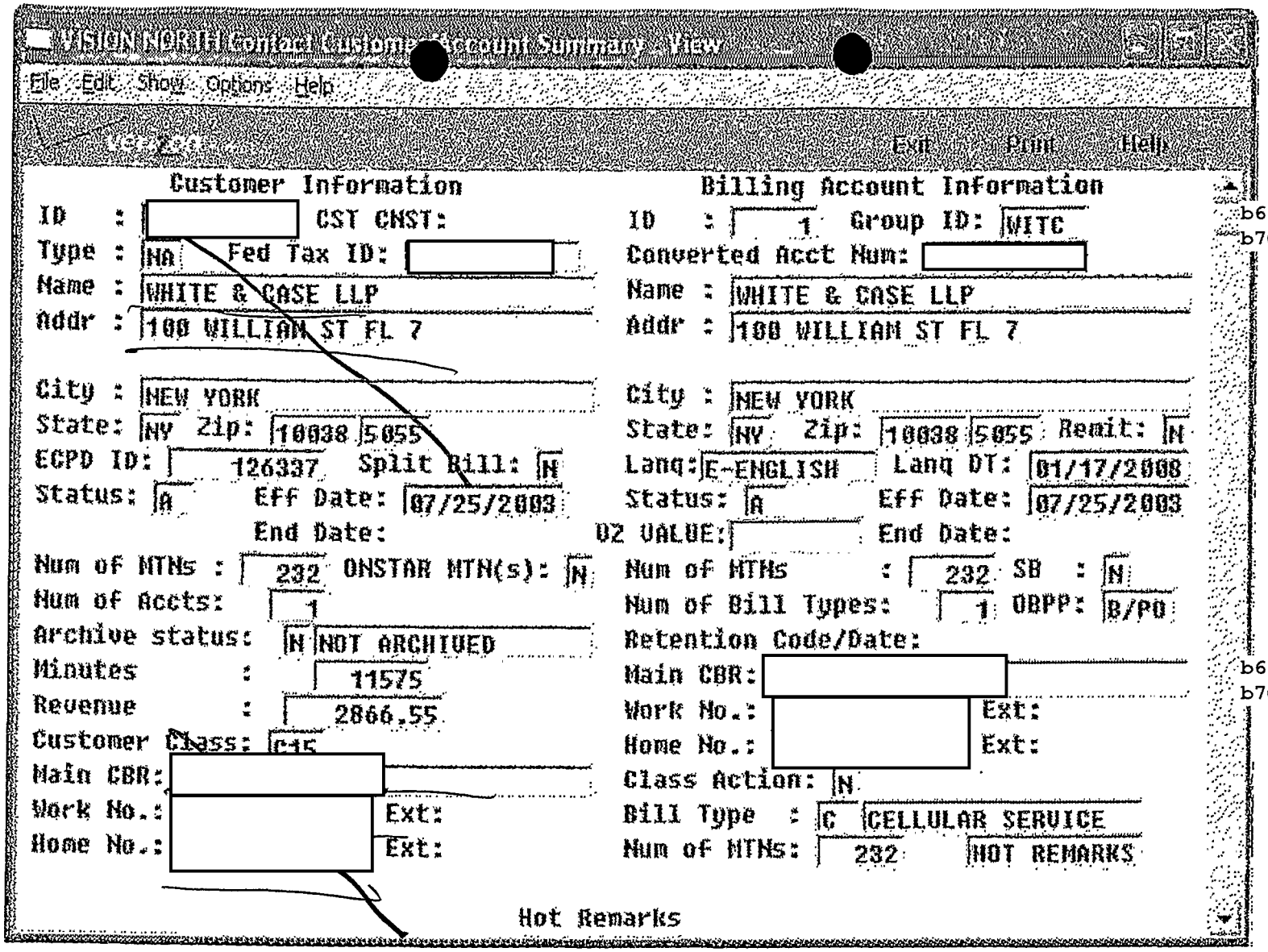
[redacted] also told [redacted] that [redacted] was aware that at least one client of IBSA of Stanford had in fact received his funding. [redacted] specifically stated that he was almost certain that one person had in fact received a substantial loan. [redacted] then stated that he is certain that he would have heard about it had the person not received the funding that was promised.

[redacted] pointed out to [redacted] that he did not know much about the company that was reportedly making the loans because his representation was of [redacted] individually. However, [redacted] reiterated that at least one person had in fact received a substantial loan and then qualified it by saying "I think it's done."

During the initial meeting at IBSA, [redacted] were advised by [redacted] that the trust that was loaning the money was a European trust that had been formed around the time of World War II. [redacted] explained that the only way that the trust beneficiary was able to remove money from the trust was if there was a business deal and a fee involved. Therefore, the trust was willing to make these types of transactions. During this first meeting at the IBSA office, [redacted] recalls that in addition to himself and [redacted] was present and at least one other woman that he does not recall. b6 b7C

During the presentation, [redacted] used the example that if there was a $100 million dollar loan, that some type of bank notes which had a long term maturity date would be purchased and a percentage of the note purchased would be use as the fall out to fund the loans of the borrowers. She stated that the fee is paid to the beneficiary of the trust and the fall out would be kept by [redacted] During this initial meeting, [redacted] was very cogent and the presentation was very well done. It was not during this initial meeting that [redacted] asked for $350,000, that came later. b6 b7C

During this first meeting at the IBSA office, [redacted] does not recall [redacted] stating that she had done one of these transactions before. It is his recollection that [redacted] stated that IBSA had done these transactions before, but that she had not yet had one of her clients get funded.



b6
b7C

b6
b7C

11

VISION NORTH Customer Accounts Associated with MIN View

File Options Help

Exit Print Help

Mobile TN : [redacted]

Today's Date: 02/02/2008

b6
b7C

Cust/Acct ID	Account Name	Status	Effective Period
[redacted]	1 WHITE & CASE LLP	A	11/19/2007-

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
FOI/PA# 1553295-000

Total Deleted Page(s) = 17
Page 5 ~ b5; b6; b7C;
Page 6 ~ b5; b6; b7C;
Page 7 ~ b5; b6; b7C;
Page 8 ~ b5; b6; b7C;
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Title and Character of Case:

WHITE AND CASE LLP
-

Date Property Acquired: 08/09/2005

Source from which Property Acquired:
AUSA'S PARALEGAL [redacted] b6 b7C
312 N SPRING ST
LOS ANGELES CA 90012-4701

Anticipated Disposition:

Acquired By: [redacted]

Case Agent: [redacted]

Description of Property: Date Entered
1C 12

STEVENS & O'CONNELL LLP COVER LETTER DATED 07/26/2005 WITH DISK CONTAINING IMAGE OF DOCUMENTS WC0026390-0030007

Barcode: Location: ECR3 08/15/2005

Case Number: 72-LA-238777
Owning Office: LOS ANGELES

EVIDENCE CC.

FD-340 (Rev. 4-11-03)

File Number 72-LA-238777 - 1A1

Field Office Acquiring Evidence LAFO

Serial # of Originating Document _____

Date Received 02/07/2007

From SA [redacted]

(Name of Contributor/Interviewee)

_____

(Address)

_____

(City and State)

By SA [redacted]

To Be Returned ☐ Yes ☒ No

Receipt Given ☐ Yes ☒ No

Grand Jury Material - Disseminate Only Pursuant to Rule 6 (e) Federal Rules of Criminal Procedure

☐ Yes ☒ No

Federal Taxpayer Information (FTI)

☐ Yes ☒ No

Title: WHITE + CASE

Reference: FD-302

(Communication Enclosing Material)

Description: ☒ Original notes re interview of [redacted]

2/12/07

b6
b7C

b6
b7C

FD-340 (Rev. 4-11-03) C C

File Number 72-LA-238777-1A2

Field Office Acquiring Evidence LAFO

Serial # of Originating Document

Date Received 03/27/2007

From SA [redacted] b6 b7C

(Name of Contributor/Interviewee)

(Address)

(City and State)

By SA [redacted]

To Be Returned ☐ Yes ☒ No

Receipt Given ☐ Yes ☒ No

Grand Jury Material - Disseminate Only Pursuant to Rule 6 (e)
Federal Rules of Criminal Procedure
☐ Yes ☒ No

Federal Taxpayer Information (FTI)
☐ Yes ☒ No

Title: WHITE + CASE

Reference: FD-302

(Communication Enclosing Material)

Description: ☒ Original notes re interview of [redacted] b6 b7C

[redacted]

4/10/07

FD-340 (Rev. 4-11-03)

File Number 72-1A-238777-1A3

Field Office Acquiring Evidence WA

Serial # of Originating Document 20

Date Received 6/12/07

From SA [redacted]

(Address)

By [redacted]

To Be Returned ☐ Yes ☐ No

Receipt Given ☐ Yes ☐ No

Grand Jury Material - Disseminate Only Pursuant to Rule 6 (e)

Federal Rules of Criminal Procedure

☐ Yes ☐ No

Federal Taxpayer Information (FTI)

☐ Yes ☐ No

Title:

Reference:

(Communication Enclosing Material)

Description: ☐ Original notes re interview of

(12) FD-192a's Bx 1C1-1C12

released to [redacted]

[redacted] 6/7/07 per CC per #20.

[redacted] 6/12/07

b6
b7C

b6
b7C

(Rev. 01-31-2003)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 06/07/2007

To: Los Angeles **Attn:** Evidence Control Center
ECT [redacted]

From: Los Angeles
Long Beach Squad 2
Contact: SA [redacted]

Approved By: [redacted]

Drafted By: [redacted]

b6
b7C

Case ID #: 72-LA-238777 (Closed) -20

Title: White & Case, LLP
New York, New York
Obstruction of Justice

Synopsis: To report permanent release of 1C evidence to United States Attorneys Office.

Details: On June 7, 2007, evidence items 1C1-1C12 were permanently released to Assistant United States Attorney [redacted] of the United States Attorneys Office, Los Angeles.

b6
b7C

♦♦

72-LA-238777-1A3

Title and Character of Case:

WHITE AND CASE LLP
-

Date Property Acquired: 07/29/2004

Source from which Property Acquired: [redacted] STEVENS & O'CONNELL, LLP
400 CAPITOL MALL, STE 1400
SACRAMENTO, CA 95814-4498

b6
b7C

Anticipated Disposition:

Acquired By: [redacted]

Case Agent: [redacted]

Description of Property: Date Entered
1C 1

DISC CONTAINING IMAGE OF DOCUMENTS WC0000001-0002502

Barcode: Location: ECR3 08/06/2004

Case Number: 72-LA-238777
Owning Office: LOS ANGELES

EVIDENCE COPY

Title and Character of Case:

WHITE AND CASE LLP
-

Date Property Acquired: 10/04/2004

Source from which Property Acquired:
AUSA'S OFFICE - PARALEGAL [redacted] b6 b7C
312 N SPRING ST
LOS ANGELES CA 900124701

Anticipated Disposition:

Acquired By: [redacted]

Case Agent: [redacted]

Description of Property: Date Entered
1C 2

(1) STEVENS & O'CONNELL, LLP COVER LETTER DATED 8/25/2004
W/ DISK CONTAINING IMAGE OF DOCUMENTS: WC0002503-WC0003172;
(1) STEVENS & O'CONNELL, LLP COVER LETTER DATED 9/21/2004
W/ DISK CONTAINING IMAGE OF DOCUMENTS: WC0003173 -WC0003267

Barcode: Location: ECR3 11/16/2004

Case Number: 72-LA-238777
Owning Office: LOS ANGELES

EVIDENCE COPY

Title and Character of Case:

WHITE AND CASE LLP
-

Date Property Acquired: 11/16/2004

Source from which Property Acquired:
AUSA'S OFFICE PARALEGAL [redacted] b6 b7C
312 N SPRING ST
LOS ANGELES, CA 90012-4701

Anticipated Disposition:

Acquired By: [redacted]

Case Agent: [redacted]

Description of Property: Date Entered
1C 3

(1) STEVENS & O'CONNELL LLP COVER LETTER DATED 10/20/04
W/DISK CONTAINING IMAGE OF DOCUMENTS WC0003268-WC0003859

Barcode: Location: ECR3 11/26/2004

Case Number: 72-LA-238777
Owning Office: LOS ANGELES

EVIDENCE COPY

Title and Character of Case:

WHITE AND CASE LLP
-

Date Property Acquired: 11/16/2004

Source from which Property Acquired:
AUSA'S OFFICE PARALEGAL [redacted]
312 N SPRING ST
LOS ANGELES CA 900124701

b6
b7C

Anticipated Disposition:

Acquired By: [redacted]

Case Agent: [redacted]

Description of Property: Date Entered
1C 4

(1) CLEARY, GOTTLIEB, STEEN, & HAMILTON COVER LETTER DATED 11/03/04 WITH DISK CONTAINING IMAGE OF DOCUMENTS CG00001-CG00854

Barcode: Location: ECR3 12/29/2004

Case Number: 72-LA-238777
Owning Office: LOS ANGELES

EVIDENCE COPY

Title and Character of Case:

WHITE AND CASE LLP
-

Date Property Acquired: Source from which Property Acquired:
AUSA'S OFFICE PARALEGAL [redacted] b6
12/20/2004 312 N SPRING ST b7C
LOS ANGELES CA 900124701

Anticipated Disposition: Acquired By: [redacted] Case Agent: [redacted]

Description of Property: Date Entered
1C 5

1) CLEARY, GOTTLIEB, STEEN, & HAMILTON COVER LETTER DATED 11/08/04 W/ ENCLOSED DOCUMENTS CG00855-CG01030

Barcode: Location: ECR3 12/29/2004

Case Number: 72-LA-238777
Owning Office: LOS ANGELES

EVIDENCE COPY

Title and Character of Case:

WHITE AND CASE LLP
-

Date Property Acquired: 12/20/2004

Source from which Property Acquired:
AUSA'S PARALEGAL [redacted] b6 b7C
312 N SPRING ST
LOS ANGELES CA 900124701

Anticipated Disposition:

Acquired By: [redacted]

Case Agent: [redacted]

Description of Property: Date Entered
1C 6

1) STEVENS & O'CONNELL LLP COVER LETTER DATED 11/2/2004 W/ DISK CONTAINING IMAGE OF DOCUMENTS WC0003860-WC000496
2) STEVENS & O'CONNELL LLP COVER LETTER DATED 11/12/2004 W/ DISK CONTAINING IMAGE FO DOCUMENTS WC0004963-WC0008654

Barcode: Location: ECR3 12/29/2004

Case Number: 72-LA-238777
Owning Office: LOS ANGELES

EVIDENCE COPY

Title and Character of Case:

WHITE AND CASE LLP
-

Date Property Acquired: 03/30/2005

Source from which Property Acquired:
AUSA'S PARALEGAL [redacted]
312 N SPRING ST
LOS ANGELES CA 90012-4701

b6
b7C

Anticipated Disposition:

Acquired By: [redacted]

Case Agent: [redacted]

Description of Property: Date Entered
1C 7

1) STEVENS & O'CONNELL LLP COVER LETTER DATED 01/12/05 W/ DISK CONTAINING IMAGE OF DOCUMENTS WC0010726 - WC0011147

Barcode: Location: ECR3 04/05/2005

Case Number: 72-LA-238777
Owning Office: LOS ANGELES

EVIDENCE COPY

Title and Character of Case:

WHITE AND CASE LLP
-

Date Property Acquired: Source from which Property Acquired:

AUSA'S PARALEGAL [redacted] b6 b7C
03/30/2005 312 N SPRING ST
LOS ANGELES CA 90012-4701

Anticipated Disposition: Acquired By: [redacted] Case Agent: [redacted]

Description of Property: Date Entered
1C 8

2) STEVENS & O'CONNELL LLP COVER LETTER DATED 02/22/2005 W/ DISK CONTAINING IMAGE OF DOCUMENTS WC0011148 - WC0015901

Barcode: Location: ECR3 04/05/2005

Case Number: 72-LA-238777
Owning Office: LOS ANGELES

EVIDENCE COPY

Title and Character of Case:

WHITE AND CASE LLP
-

Date Property Acquired: 06/28/2005

Source from which Property Acquired:
AUSA'S PARALEGAL [redacted] b6 b7C
312 N SPRING ST
LOS ANGELES CA 900124701

Anticipated Disposition:

Acquired By: [redacted]

Case Agent: [redacted]

Description of Property: Date Entered
1C 9

1) STEVENS & O'CONNELL LLP COVER LETTER DATED 11/24/04 W/ DISK CONTAINING IMAGE OF DOCUMENTS WC0008655-WC0010725

Barcode: Location: ECR3 07/01/2005

Case Number: 72-LA-238777
Owning Office: LOS ANGELES

EVIDENCE COPY

Title and Character of Case:

WHITE AND CASE LLP
-

Date Property Acquired: 07/07/2005

Source from which Property Acquired:
AUSA'S PARALEGAL [redacted] b6 b7C
312 N SPRING STR
LOS ANGELES CA 90012-4701

Anticipated Disposition:

Acquired By: [redacted]

Case Agent: [redacted]

Description of Property: Date Entered
1C 10

1) STEVENS & O'CONNELL LLP COVER LETTER DATED 4/22/2005 W/ DISK CONTAINING IMAGE OF DOCUMENTS WC0015902-EC0016444
2) STEVENS & O'CONNELL LLP COVER LETTER DATED 5/11/2005 W/ DISK CONTAINING IMAGE OF DOCUMENTS WC0016445-WC0017893
3) STEVENS & O'CONNELL LLP COVER LETTER DATED 5/25/2005 W/ DISK CONTAINING IMAGE OF DOCUMENTS WC0017894-WC0022820
4) STEVENS & O'CONNELL LLP COVER LETTER DATED 6/01/2005 W/ DISK CONTAINING IMAGE OF DOCUMENTS WC0022821-0023764

Barcode: Location: ECR3 07/12/2005

Case Number: 72-LA-238777
Owning Office: LOS ANGELES

EVIDENCE COPY

Title and Character of Case:

WHITE AND CASE LLP
-

Date Property Acquired: Source from which Property Acquired:
AUSA'S PARALEGAL [redacted] b6
07/14/2005 312 N SPRING ST b7C
LOS ANGELES CA 90012-4701

Anticipated Disposition: Acquired By: [redacted] Case Agent: [redacted]

Description of Property: Date Entered
1C 11

STEVENS & O'CONNELL LLP COVER LETTER DATED 06/30/2005 WITH
DISK CONTAINING IMAGE OF DOCUMENTS WC0023765-0026389

Barcode: Location: ECR3 07/25/2005

Case Number: 72-LA-238777
Owning Office: LOS ANGELES

EVIDENCE COPY

FD-340a (Rev. 1-27-03)

(Title) White and Case, LLP

Volume 1

(File No.) 72-LA-238777

Item	Date Filed	To be returned Yes	To be returned No		Disposition
1A1	2/12/07		X	notes re:	
1A2	4/10/07		X	notes r	

b6
b7C

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
FOI/PA# 1553295-000

Total Deleted Page(s) = 13
Page 32 ~ b3; b5; b6; b7C;
Page 42 ~ Duplicate;
Page 50 ~ Duplicate;
Page 51 ~ Duplicate;
Page 52 ~ Duplicate;
Page 53 ~ Duplicate;
Page 61 ~ Duplicate;
Page 62 ~ Duplicate;
Page 63 ~ Duplicate;
Page 64 ~ Duplicate;
Page 65 ~ Duplicate;
Page 66 ~ Duplicate;
Page 67 ~ Duplicate;

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X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXXXX

(Rev. 01-31-2003)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 06/07/2007

To: Los Angeles **Attn:** Evidence Control Center
ECT [redacted] b6 b7C

From: Los Angeles
Long Beach Squad 2
Contact: SA [redacted]

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 72-LA-238777 (Closed) -20

Title: White & Case, LLP
New York, New York
Obstruction of Justice

[redacted] b6 b7C

Synopsis: To report permanent release of 1C evidence to United States Attorneys Office.

Details: On June 7, 2007, evidence items 1C1-1C12 were permanently released to Assistant United States Attorney [redacted] of the United States Attorneys Office, Los Angeles.

♦♦

[redacted] b6 b7C

1S [redacted] 01.ec

the earlier conduct including acquisition of Executive Life and its bond portfolio. Central to that representation was an assertion that [redacted] had not seen an important December, 1993 memo that would have given [redacted] knowledge of the fraud much earlier than had previously been admitted. b6 b7C

During the underlying investigation, Credit Lyonnais was represented by the law firm of Cleary, Gottlieb, Steen & Hamilton, and CDR was represented by the law firm of White & Case. Until recently, White & Case represented that the version of the memo provided to the United States Attorneys Office and the Federal Reserve, without [redacted] initials, was the only version in existence. White & Case also represented through presentations to the United States Attorneys Office and others that [redacted] was not aware of the Executive Life scheme as early as 1993.

In September, 2003, a version of the December, 1993 memo containing details of the Executive Life scheme which was marked with [redacted] initials was discovered by the California Department of Insurance and forwarded to the United States Attorneys Office. Due to the importance of the memo and the implications of finding an initialed version, the United States Attorneys Office would like to pursue an investigation into the concealment of the memo, particularly by White & Case. b6 b7C

On July 14, 2004, writer met with Assistant United States Attorney (AUSA) [redacted] and AUSA [redacted] to discuss the investigation. [redacted] b3 b5 b6 b7C

Based upon the foregoing, it is requested that a new 72 (Obstruction of Justice) case be opened and assigned to SA [redacted]

♦♦

Title and Character of Case:

WHITE AND CASE LLP
-

Date Property Acquired: 07/29/2004

Source from which Property Acquired: [redacted]
STEVENS & O'CONNELL, LLP
400 CAPITOL MALL, STE 1400
SACRAMENTO, CA 95814-4498

b6
b7C

Anticipated Disposition:

Acquired By: [redacted]

Case Agent: [redacted]

Description of Property: Date Entered
1C 1

DISC CONTAINING IMAGE OF DOCUMENTS WC0000001-0002502

Barcode: Location: ECR3 08/06/2004

Case Number: 72-LA-238777
Owning Office: LOS ANGELES

FILE COPY

b6
b7C

72-LA-238777 1C1

Title and Character of Case:

WHITE AND CASE LLP
-

Date Property Acquired: 10/04/2004

Source from which Property Acquired:
AUSA'S OFFICE - PARALEGAL [redacted] b6 b7C
312 N SPRING ST
LOS ANGELES CA 900124701

Anticipated Disposition:

Acquired By: [redacted]

Case Agent: [redacted]

Description of Property: Date Entered
1C 2

(1) STEVENS & O'CONNELL, LLP COVER LETTER DATED 8/25/2004
W/ DISK CONTAINING IMAGE OF DOCUMENTS: WC0002503-WC0003172;
(1) STEVENS & O'CONNELL, LLP COVER LETTER DATED 9/21/2004
W/ DISK CONTAINING IMAGE OF DOCUMENTS: WC0003173 -WC0003267

Barcode: Location: ECR3 11/16/2004

Case Number: 72-LA-238777
Owning Office: LOS ANGELES

b6
b7C
[redacted]

FILE COPY

72-LA-238777 1C2

Title and Character of Case:

WHITE AND CASE LLP
-

Date Property Acquired: 11/16/2004

Source from which Property Acquired:
AUSA'S OFFICE PARALEGAL [redacted]
312 N SPRING ST
LOS ANGELES, CA 90012-4701

b6
b7C

Anticipated Disposition:

Acquired By: [redacted]

Case Agent: [redacted]

Description of Property:

Date Entered

1C 3

(1) STEVENS & O'CONNELL LLP COVER LETTER DATED 10/20/04 W/DISK CONTAINING IMAGE OF DOCUMENTS WC0003268-WC0003859

Barcode:

Location: ECR3

11/26/2004

Case Number: 72-LA-238777
Owning Office: LOS ANGELES

b6
b7C

[redacted]

FILE COPY

72-LA-238777 1C3

Title and Character of Case:

WHITE AND CASE LLP
-

Date Property Acquired: 11/16/2004

Source from which Property Acquired:
AUSA'S OFFICE PARALEGAL [redacted]
312 N SPRING ST
LOS ANGELES CA 900124701

b6
b7C

Anticipated Disposition:

Acquired By: [redacted]

Case Agent: [redacted]

Description of Property: Date Entered
1C 4

(1) CLEARY, GOTTLIEB, STEEN, & HAMILTON COVER LETTER DATED 11/03/04 WITH DISK CONTAINING IMAGE OF DOCUMENTS CG00001-CG00854

Barcode: Location: ECR3 12/29/2004

Case Number: 72-LA-238777
Owning Office: LOS ANGELES

b6
b7C

FILE COPY

72-LA-238777-1C4

Title and Character of Case:

WHITE AND CASE LLP
-

Date Property Acquired: 12/20/2004

Source from which Property Acquired:
AUSA'S OFFICE PARALEGAL [redacted] b6 b7C
312 N SPRING ST
LOS ANGELES CA 900124701

Anticipated Disposition:

Acquired By: [redacted]

Case Agent: [redacted]

Description of Property: Date Entered
1C 5

1) CLEARY, GOTTLIEB, STEEN, & HAMILTON COVER LETTER DATED 11/08/04 W/ ENCLOSED DOCUMENTS CG00855-CG01030

Barcode: Location: ECR3 12/29/2004

Case Number: 72-LA-238777
Owning Office: LOS ANGELES

b6
b7C [redacted]

FILE COPY

72-LA-238777 1C5

Title and Character of Case:

WHITE AND CASE LLP
-

Date Property Acquired: 12/20/2004

Source from which Property Acquired:
AUSA'S PARALEGAL [redacted]
312 N SPRING ST
LOS ANGELES CA 900124701

b6
b7C

Anticipated Disposition: [redacted]

Acquired By: [redacted]

Case Agent: [redacted]

Description of Property: Date Entered
1C 6

1) STEVENS & O'CONNELL LLP COVER LETTER DATED 11/2/2004 W/ DISK CONTAINING IMAGE OF DOCUMENTS WC0003860-WC000496
2) STEVENS & O'CONNELL LLP COVER LETTER DATED 11/12/2004 W/ DISK CONTAINING IMAGE FO DOCUMENTS WC0004963-WC0008654

Barcode: Location: ECR3 12/29/2004

Case Number: 72-LA-238777
Owning Office: LOS ANGELES

b6
b7C
[redacted]

FILE COPY

72-LA-238777-106

Title and Character of Case:

WHITE AND CASE LLP
-

Date Property Acquired: 03/30/2005

Source from which Property Acquired:
AUSA'S PARALEGAL [redacted]
312 N SPRING ST
LOS ANGELES CA 90012-4701

b6
b7C

Anticipated Disposition:

Acquired By: [redacted]

Case Agent: [redacted]

Description of Property: Date Entered
1C 7

1) STEVENS & O'CONNELL LLP COVER LETTER DATED 01/12/05 W/ DISK CONTAINING IMAGE OF DOCUMENTS WC0010726 - WC0011147

Barcode: Location: ECR3 04/05/2005

Case Number: 72-LA-238777
Owning Office: LOS ANGELES

b6
b7C

FILE COPY

72-LA-238777 1C7

Title and Character of Case:

WHITE AND CASE LLP
-

Date Property Acquired: 03/30/2005

Source from which Property Acquired:
AUSA'S PARALEGAL [redacted]
312 N SPRING ST
LOS ANGELES CA 90012-4701

b6
b7C

Anticipated Disposition:

Acquired By: [redacted]

Case Agent: [redacted]

Description of Property: Date Entered
1C 8

2) STEVENS & O'CONNELL LLP COVER LETTER DATED 02/22/2005 W/ DISK CONTAINING IMAGE OF DOCUMENTS WC0011148 - WC0015901

Barcode: Location: ECR3 04/05/2005

Case Number: 72-LA-238777
Owning Office: LOS ANGELES

b6
b7C

[redacted]

FILE COPY

72-LA-238777 1C8

Title and Character of Case:

WHITE AND CASE LLP
-

Date Property Acquired: 06/28/2005

Source from which Property Acquired:
AUSA'S PARALEGAL [redacted]
312 N SPRING ST
LOS ANGELES CA 900124701

b6
b7C

Anticipated Disposition:

Acquired By: [redacted]

Case Agent: [redacted]

Description of Property: Date Entered
1C 9

1) STEVENS & O'CONNELL LLP COVER LETTER DATED 11/24/04 W/ DISK CONTAINING IMAGE OF DOCUMENTS WC0008655-WC0010725

Barcode: Location: ECR3 07/01/2005

Case Number: 72-LA-238777
Owning Office: LOS ANGELES

FILE COPY

109 b6 b7C

Title and Character of Case:

WHITE AND CASE LLP
-

Date Property Acquired: 07/07/2005

Source from which Property Acquired:
AUSA'S PARALEGAL [redacted]
312 N SPRING STR
LOS ANGELES CA 90012-4701

b6
b7C

Anticipated Disposition: [redacted]

Acquired By: [redacted]

Case Agent: [redacted]

Description of Property: Date Entered

1C 10

1) STEVENS & O'CONNELL LLP COVER LETTER DATED 4/22/2005 W/ DISK CONTAINING IMAGE OF DOCUMENTS WC0015902-EC0016444
2) STEVENS & O'CONNELL LLP COVER LETTER DATED 5/11/2005 W/ DISK CONTAINING IMAGE OF DOCUMENTS WC0016445-WC0017893
3) STEVENS & O'CONNELL LLP COVER LETTER DATED 5/25/2005 W/ DISK CONTAINING IMAGE OF DOCUMENTS WC0017894-WC0022820
4) STEVENS & O'CONNELL LLP COVER LETTER DATED 6/01/2005 W/ DISK CONTAINING IMAGE OF DOCUMENTS WC0022821-0023764

Barcode: Location: ECR3 07/12/2005

Case Number: 72-LA-238777
Owning Office: LOS ANGELES

FILE COPY

1010

Title and Character of Case:

WHITE AND CASE LLP
-

Date Property Acquired: 07/14/2005

Source from which Property Acquired:
AUSA'S PARALEGAL [redacted]
312 N SPRING ST
LOS ANGELES CA 90012-4701

b6
b7C

Anticipated Disposition:

Acquired By: [redacted]

Case Agent: [redacted]

Description of Property: Date Entered
1C 11

STEVENS & O'CONNELL LLP COVER LETTER DATED 06/30/2005 WITH DISK CONTAINING IMAGE OF DOCUMENTS WC0023765-0026389

Barcode: Location: ECR3 07/25/2005

Case Number: 72-LA-238777
Owning Office: LOS ANGELES

FILE COPY

b6
b7C

1C11

Title and Character of Case:

WHITE AND CASE LLP
-

Date Property Acquired: 08/09/2005

Source from which Property Acquired:
AUSA'S PARALEGAL [redacted] b6 b7C
312 N SPRING ST
.LOS ANGELES CA 90012-4701

Anticipated Disposition:

Acquired By: [redacted]

Case Agent: [redacted]

Description of Property: Date Entered
1C 12

STEVENS & O'CONNELL LLP COVER LETTER DATED 07/26/2005 WITH DISK CONTAINING IMAGE OF DOCUMENTS WC0026390-0030007

Barcode: Location: ECR3 08/15/2005

Case Number: 72-LA-238777
Owning Office: LOS ANGELES

FILE COPY

b6
b7C

72-LA-238777-1C12

(Rev. 10-01-1999)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 07/30/2004

To: Los Angeles

From: Los Angeles
LBRA Squad 2
Contact: SA [redacted] b6 b7C b7E

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 72-LA-238777 ✓ (Pending) -2
318A-LA-220319 (Pending) -344

Title: White & Case, LLP
New York, New York
Obstruction of Justice

Synopsis: Summary of 07/29/2004 presentation by attorneys [redacted] and [redacted] of Stevens & O'Connell LLP to the United States Attorneys Office. b6 b7C

Details: On 07/29/2004, attorneys [redacted] and [redacted] ("the attorneys"), Stevens & O'Connell LLP, 400 Capitol Mall, Suite 1400, Sacramento, California 95814, telephone number (916)329-9111 made a presentation to the United States Attorneys Office on behalf of their client, White & Case. In attendance at the meeting were Assistant United States Attorneys (AUSAs) [redacted] and [redacted], Paralegal Specialist [redacted] and Special Agent (SA) [redacted]. b6 b7C b7E

[redacted] b5 b6 b7C b7E

215 [redacted] 01.EC

72-LA-238777-2

b6 b7C

[redacted] b5 b6 b7C b7E

[redacted] b5 b6 b7C b7E

[redacted] b5

[redacted] b5

[redacted] b5 b6 b7C

[redacted] b5 b6 b7C

[redacted] b5

[redacted] b5 b6 b7C

[redacted] b5 b6 b7C

[redacted] b5 b6 b7C

[redacted] b5

[redacted] b5

[redacted] b5 b6 b7C

[redacted] b5 b6 b7C

[redacted] b5 b6 b7C

[redacted] b5 b6 b7C

♦♦

(Rev. 10-01-1999)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 09/23/2004

To: Los Angeles

From: Los Angeles
LBRA Squad 2
Contact: SA [redacted] b6 b7C b7E

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 72-LA-238777 (Pending) — 3
318A-LA-220319 (Pending) - 347

Title: White & Case, LLP
New York, New York
Obstruction of Justice

Synopsis: Summary of 09/23/2004 telephonic meeting between attorneys of the law firm of Stevens & O'Connell LLP and the United States Attorneys Office.

Details: On 09/23/2004, attorneys [redacted] and [redacted] ("the attorneys"), Stevens & O'Connell LLP, 400 Capitol Mall, Suite 1400, Sacramento, California 95814, telephone number (916)329-9111 engaged in a telephonic meeting with Assistant United States Attorneys (AUSAs) [redacted] and [redacted] Paralegal Specialist [redacted] and Special Agent (SA) [redacted] b6 b7C

[redacted] b5 b6 b7C

[redacted] b6 b7C

72-LA-238777-3

[redacted] b5 b6 b7C

[redacted] b5 b6 b7C

[redacted] b5

[redacted] b5 b6 b7C

[redacted] b5

[redacted] b5 b6 b7C

[redacted] b5 b6 b7C

[redacted] b5

[redacted] b5

[redacted] b5 b6 b7C

[redacted] b5 b6 b7C

[redacted] b5 b6 b7C

[redacted] b5 b6 b7C

[redacted] b5

[redacted] b5 b6 b7C

[redacted] b5 b6 b7C

♦♦

(Rev. 10-01-1999)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 10/18/2004

To: Los Angeles

From: Los Angeles
LBRA Squad 2
Contact: SA [redacted] b6 b7C b7E

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 72-LA-238777 (Pending) -4
318A-LA-220319 (Pending) -348

Title: White & Case, LLP
New York, New York
Obstruction of Justice

Synopsis: Notification of maternity leave.

Details: Case agent will be on maternity leave until approximately February 1, 2005. The AUSAs prosecuting this matter, [redacted] and [redacted] have been notified of case agent's leave and has been advised of contact information for case agent and case agent's supervisor during the period of maternity leave. In addition, SA [redacted] has been designated to receive and enter any evidence that comes in during this time period, and will assist the AUSAs if any interviews are necessary before case agent's return. b6 b7C

♦♦

29[redacted]03.ec

72-LA-238777-4

b6 b7C

(Rev. 10-01-1999)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 11/10/2004

To: New York

From: Los Angeles
LBRA Squad 2
Contact: A/SSA [redacted] b6 b7C b7E

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 72-LA-238777 (Pending) -5
318A-LA-220319 (Pending) -349

Title: White & Case, LLP
New York, New York
Obstruction of Justice

Synopsis: Set lead for New York to assist Los Angeles AUSA who will be traveling to New York the week of December 6-10, 2004.

Details: The underlying case, 318A-LA-220319, centered on the investigation of the role of French Bank Credit Lyonnais and others in a scheme to defraud policyholders of defunct California insurer Executive Life Insurance Co. In 1991, Credit Lyonnais acquired Executive Life, along with its junk bond portfolio, through a series of sham transactions that were concealed from U.S. regulatory authorities. At the time, U.S. banking law prohibited a bank from owning a nonbank entity like an insurance company. In addition, California law prohibited a foreign government, or a bank or corporation controlled by a foreign government, from owning an insurance company. Credit Lyonnais and its affiliates purchased Executive Life and its junk bonds anyway, by fraudulently concealing the extent of their interest in the company through the use of shell companies to hide the source of the purchasing funds and make the ownership of the bond portfolio appear to be more widespread than it was.

Credit Lyonnais' CEO at the time of the acquisition of Executive Life and the bond portfolio was [redacted] In November, 1993, [redacted] was dismissed from his position and replaced by [redacted]. During the investigation of Credit Lyonnais, it was asserted by Credit Lyonnais and its subsidiary, CDR, that the bank, under [redacted], had reformed itself, and that current management was not involved with and only recently became aware of the earlier conduct including acquisition of Executive Life and its bond portfolio. Central to that b6 b7C

31 [redacted] 01.04 72-LA-238777-5 [redacted] b6 b7C

representation was an assertion that [redacted] had not seen an important December, 1993 memo that would have given [redacted] knowledge of the fraud much earlier than had previously been admitted. b6 b7C

During the underlying investigation, Credit Lyonnais was represented by the law firm of Cleary, Gottlieb, Steen & Hamilton, and CDR was represented by the law firm of White & Case. Until recently, White & Case represented that the version of the memo provided to the United States Attorneys Office and the Federal Reserve, without [redacted] initials, was the only version in existence. White & Case also represented through presentations to the United States Attorneys Office and others that [redacted] was not aware of the Executive Life scheme as early as 1993. b6 b7C

In September, 2003, a version of the December, 1993 memo containing details of the Executive Life scheme which was marked with [redacted] initials was discovered by the California Department of Insurance and forwarded to the United States Attorneys Office (USAO). Due to the importance of the memo and the implications of finding an initialed version, an investigation was initiated to determine whether the memo was deliberately concealed by White & Case (72-LA-238777). b6 b7C

Since the investigation was initiated, White & Case has made presentations to the USAO and provided documents to explain their previous denial of the existence of the memo. During the week of December 6, 2004, AUSA [redacted] and Paralegal Specialist [redacted] will be traveling to New York. They will be reviewing documents and possibly conducting interviews at the Federal Reserve Bank and at the offices of White & Case. AUSA [redacted] believes that the assistance of an SA will be necessary on December 8 and 9, 2004. He would also like an SA to be available on December 6, 7 and 10 in case he needs the assistance of the FBI on those dates as well.

LEAD(s):

Set Lead 1: (Action)

NEW YORK

AT NEW YORK

It is requested that one SA be made available to assist AUSA [redacted], for the period of December 6, 2004 through December 10, 2004 for a document review project which is to take place both at the Federal Reserve Bank and at the offices of the law firm of White & Case, New York. It is anticipated that the SA will be needed on the dates of December 8 and 9, 2004, and will possibly be needed on December 6, 7, and 10, 2004. It is requested that the SA assigned to the lead call AUSA [redacted] upon receipt of this lead so that contact arrangements can be made. b6 b7C

♦♦

72-LA-238777 – 6
BK:bk

1

The following action was conducted by SA [redacted] and SA [redacted] on December 7, 2004 and December 8, 2004: b6 b7C

SA [redacted] and SA [redacted] accompanied [redacted] Assistant United States Attorney (AUSA) and [redacted] Paralegal Specialist, both of the Office of the United States Attorney, Central District of California while in Manhattan for the above captioned case. On 12/07/2004 SA [redacted] and SA [redacted] accompanied AUSA [redacted] and Paralegal Specialist [redacted] while at the Federal Reserve Bank of New York, located at 33 Liberty Street, Manhattan, New York. b6 b7C

On 12/08/2004 SA [redacted] and SA [redacted] accompanied AUSA [redacted] and Paralegal Specialist [redacted] to the offices of White and Case, located on 1155 Avenue of the Americas, Manhattan, New York.

[redacted] b6 b7C

(Rev. 01-31-2003)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 12/09/2004

To: Los Angeles **Attn:** A/SSA [redacted] b6 b7C b7E
LBRA SQUAD 2

From: New York
C-14
Contact: SA [redacted]

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 72-LA-238777 - 7 (Pending)
318A-LA-220319 (Pending)

Title: White & Case, LLP
New York, New York
Obstruction of Justice

Synopsis: To advise Los Angeles of lead covered in captioned matter.

Enclosure(s): Enclosed is an insert dated 12/09/2004.

Details: On 12/07/2004 and 12/08/2004 SA [redacted] and SA [redacted] b6 b7C accompanied [redacted] Assistant United States Attorney (AUSA) and [redacted] Paralegal Specialist, both of the Office of the United States Attorney, Central District of California while in Manhattan for the above captioned case. On 12/07/2004 SA [redacted] and SA [redacted] accompanied AUSA [redacted] and Paralegal Specialist [redacted] while at the Federal Reserve Bank of New York, located at 33 Liberty Street, Manhattan, New York.

On 12/08/2004 SA [redacted] and SA [redacted] accompanied AUSA [redacted] b6 b7C and Paralegal Specialist [redacted] to the offices of White and Case, located on 1155 Avenue of the Americas, Manhattan, New York.

New York considers this lead covered.

UPLOADED
WITH/TEXT ✓
WITH/OUT TEXT
BY [redacted]
DATE 12/27/04

72-LA-238777-7

[redacted] b6 b7C

LEAD(s):

Set Lead 1: (Action)

LOS ANGELES

AT LOS ANGELES, CALIFORNIA

Read and clear.

♦♦

(Rev. 10-01-1999)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 05/09/2005

To: Los Angeles

From: Los Angeles
LBRA Squad 2
Contact: SA [redacted] b6 b7C b7E

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: ~~72~~-LA-238777 (Pending)-9
318A-LA-220319 (Pending)

[redacted]

Title: White & Case, LLP
New York, New York
Obstruction of Justice

Synopsis: To update file regarding status of the investigation.

Details: On May 6, 2005, SA [redacted] spoke with AUSA [redacted] regarding the status of the case. b6 b7C

In February and March, 2005, SA [redacted] reviewed binders of documents provided by subject's attorneys at the U.S. Attorneys' Office. SA [redacted] marked the key documents which will be used to build the case. AUSA [redacted] was preparing for b5 b6 b7C

[redacted]

♦♦

129 [redacted] 3.EC

72-LA-238777-9

[redacted] b6 b7C

(Rev. 10-01-1999)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 06/02/2005

To: Los Angeles

From: Los Angeles
LBRA Squad 2
Contact: SA [redacted] b6 b7C b7E

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 72-LA-238777 (Pending) -10
318A-LA-220319 (Pending) -354

Title: White & Case, LLP
New York, New York
Obstruction of Justice

(X) [redacted]

Synopsis: Summary of 06/01/2005 meeting between attorneys of the law firm of Stevens & O'Connell LLP and the United States Attorneys Office regarding captioned matter.

Details: On 06/01/2005, attorneys [redacted] and [redacted] ("the attorneys"), Stevens & O'Connell LLP, 400 Capitol Mall, Suite 1400, Sacramento, California 95814, telephone number (916)329-9111 made a presentation at the United States Attorneys Office, Los Angeles, California, to Assistant United States Attorneys (AUSAs) [redacted], [redacted] and [redacted] and Special Agent (SA) [redacted] of the Federal Bureau of Investigation (FBI). [redacted] b5 b6 b7C

[redacted] b5 b6 b7C

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72-LA-238777-10

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[redacted] b5 b6 b7C

[redacted] b5 b6 b7C

[redacted] b5 b6 b7C

[redacted] b5 b6 b7C

[redacted] b5 b6 b7C

[redacted] b5 b6 b7C

[redacted] b5

[redacted] b5 b6 b7C

[redacted] b5 b6 b7C

[redacted] b5 b6 b7C

[redacted] b5 b6 b7C

[redacted] b5 b6 b7C

♦♦

(Rev. 10-01-1999)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 06/28/2005

To: Los Angeles

From: Los Angeles
LBRA Squad 2
Contact: SA [redacted] b6 b7C b7E

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 72-LA-238777 (Pending) -11
318A-LA-220319 (Pending) -355

(N) [redacted]

Title: White & Case, LLP
New York, New York
Obstruction of Justice

Synopsis: To update file regarding status of the investigation.

Details: On June 16, 2005, and June 28, 2005, SA [redacted] met with AUSAs [redacted] and [redacted] to review documents provided by White & Case. b6 b7C

The documents which are relevant to the investigation were identified, and writer created a spreadsheet of them, attached hereto. A list of witnesses who will be brought before the grand jury shortly is being compiled.

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72-LA-238777-11

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(Rev. 10-01-1999)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 08/03/2005

To: Los Angeles

From: Los Angeles
LBRA Squad 2
Contact: SA [redacted] b6 b7C b7E

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: ~~72~~-LA-238777 (Pending) -12
318A-LA-220319 (Pending) -356

Title: White & Case, LLP
New York, New York
Obstruction of Justice

[redacted] b6 b7C

Synopsis: To update file regarding status of the investigation.

Details: On July 27, 2005, and August 2, 2005, SA [redacted] met with AUSAs [redacted] and [redacted] to review documents provided by White & Case.

The documents which are relevant to the investigation were identified, and writer is keeping a running spreadsheet of the documents. A list of witnesses who will be brought before the grand jury shortly is being compiled.

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215 [redacted] 01.ec

72-LA-238777-12

(Rev. 10-01-1999)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 10/03/2005

To: Los Angeles

From: Los Angeles
LBRA Squad 2
Contact: SA [redacted] b6 b7C b7E

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: ✓72-LA-238777 (Pending)-13
318A-LA-220319 (Pending) [redacted]

[redacted]

Title: White & Case, LLP
New York, New York
Obstruction of Justice

Synopsis: To update file regarding status of the investigation.

Details: On August 19, 2005, and September 27, 2005, SA [redacted] b6 b7C met with AUSA [redacted] to review documents provided by White & Case.

The documents which are relevant to the investigation were identified, and writer is keeping a running spreadsheet of the documents. A list of witnesses who will be brought before the grand jury shortly is being compiled.

♦♦

276 [redacted] 01.ec

72-LA-238777-13

b6 b7C [redacted]

(Rev. 10-01-1999)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 04/10/2006

To: Los Angeles

From: Los Angeles
LBRA Squad 2
Contact: SA [redacted] b6 b7C b7E

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 72-LA-238777 (Pending) -14
318A-LA-220319 (Pending) -374

Title: White & Case, LLP
New York, New York
Obstruction of Justice

[redacted]

Synopsis: To update file regarding status of the investigation.

Details: On April 10, 2006, SA [redacted] spoke with AUSA [redacted] regarding the status of the case and whether or not it should be pursued. AUSA [redacted] b3 b5 b6 b7C

[redacted]

AUSA [redacted] and SA [redacted] have been reviewing the documents as they have arrived and found [redacted]

[redacted]

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72-LA-238777-14

[redacted] b6 b7C

(Rev. 10-01-1999)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 10/16/2006

To: Los Angeles

From: Los Angeles
LBRA Squad 2
Contact: SA [redacted] b6 b7C

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 72-LA-238777 (Pending) -15
318A-LA-220319 (Pending) -387

Title: White & Case, LLP
New York, New York
Obstruction of Justice

Synopsis: To update file regarding status of the investigation.

Details: On October 3, 2006, SA [redacted] spoke with AUSA [redacted] regarding the status of the case and whether or not it should be pursued. AUSA [redacted] b3 b5 b6 b7C

[redacted]

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[redacted] 07.ec b6 b7C

72-LA-238777-15

(Rev. 10-01-1999)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 12/22/2006

To: Los Angeles

From: Los Angeles
LBRA Squad 2
Contact: SA [redacted] b6 b7C b7E

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 72-LA-238777 (Pending) -16
318A-LA-220319 (Pending) -393

Title: White & Case, LLP
New York, New York
Obstruction of Justice

Synopsis: To update file regarding status of the investigation.

Details: On December 22, 2006, SA [redacted] spoke with AUSA [redacted] regarding the status of the case and whether or not it should be pursued. AUSA [redacted] b3 b5 b6 b7C

[redacted]

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[redacted] b6 b7C

72-LA-238777-16

FD-302 (Rev. 10-6-95)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 02/08/2007

[redacted], date of birth [redacted], business address [redacted], telephone number [redacted], was interviewed at his place of employment by Assistant United States Attorney (AUSA) [redacted] and Special Agent (SA) [redacted]. Also present on behalf of White & Case was attorney [redacted], Stevens & O'Connell, LLP, 400 Capitol Mall, Suite 1400, Sacramento, California 95814, telephone number (916)329-9111. After being advised of the identities of the interviewers and the nature of the interview, [redacted] provided the following information:

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Investigation on 02/07/2007 at Fresno, California

File # 72-LA-238777-17 Date dictated

by SA [redacted]

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This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

Continuation of FD-302 of [redacted], On 02/07/2007, Page 2 b5 b6 b7C

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[redacted] b5 b6 b7C

[redacted] b5 b6 b7C

[redacted] b5 b6 b7C

[redacted] b5 b6 b7C

[redacted] b5 b6 b7C

[redacted] b5 b6 b7C

[redacted] b5 b6 b7C

[redacted] b5 b6 b7C

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[redacted]

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[redacted]

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 03/28/2007

[redacted] date of birth [redacted], [redacted] [redacted] telephone number [redacted], was interviewed at the United States Attorneys Office (USAO), Los Angeles, California by Assistant United States Attorney (AUSA) [redacted] and Special Agent (SA) [redacted]. Also present, on behalf of White & Case, were attorneys [redacted] and [redacted] Stevens & O'Connell, LLP, 400 Capitol Mall, Suite 1400, Sacramento, California 95814, telephone number (916)329-9111. After being advised of the identities of the interviewers and the nature of the interview, [redacted] provided the following information:

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Investigation on 03/27/2007 at Los Angeles, California

File # 72-LA-238777 -18 Date dictated

by SA [redacted]

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This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

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(Rev. 10-01-1999)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 04/06/2007

To: Los Angeles

From: Los Angeles
LBRA Squad 2
Contact: SA [redacted] b6 b7C b7E

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: ✓72-LA-238777 (Pending) -19
318A-LA-220319 (Pending) -395

Title: White & Case, LLP
New York, New York
Obstruction of Justice

Synopsis: Recommendation that captioned matter, 72-LA-238777, be closed.

(X) [redacted] b6 b7C

Details: Captioned matter involved the investigation of the possible role of the law firm of White & Case in withholding evidence in the underlying case, 318A-LA-220319.

The underlying investigation centered on Credit Lyonnais' attempt to hide its involvement in the acquisition of the now-defunct California insurer, Executive Life, and its bond portfolio in the early 1990s. During that investigation, it was asserted by Credit Lyonnais and its subsidiary, CDR, that the bank had reformed itself, and that current management was not involved with and only recently became aware of the conduct undertaken by previous Credit Lyonnais management. Central to that representation was an assertion that current management had not seen an important December, 1993 memo that would have given knowledge of the fraud much earlier than had previously been admitted.

In September, 2003, a version of the December, 1993 memo containing details of the Executive Life scheme which was marked with the current Credit Lyonnais' president's initials was discovered by the California Department of Insurance and forwarded to the United States Attorneys Office (USAO). The USAO had previously asked White & Case for all versions of this memo, specifically any versions with the initials on it. Due to the importance of the memo and the implications of finding an initialed version, the United States Attorneys Office requested

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ASSIGN TO SA _____

SA [redacted] DATE 04-07-07

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72-LA-238777-19

that the FBI open an investigation to determine whether White & Case was criminally responsible for concealing the memo.

Writer and Assistant United States Attorney (AUSA) [redacted] have reviewed numerous boxes of documents provided by White & Case, met with their attorneys and conducted interviews of former White & Case employees. Based on the results of the investigation, AUSA [redacted] b6 b7C b5

There is no outstanding evidence in this matter.

Based upon the foregoing, it is requested that 72-LA-238777 be closed.

♦♦

(Rev. 10-01-1999)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 07/26/2004

To: Los Angeles

From: Los Angeles
LBRA Squad 2
Contact: SA [redacted]

Approved By: [redacted]

Drafted By: [redacted]

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Case ID #: 72-LA-238777 (Pending) — 1
318A-LA-220319 (Pending — 343

Title: White & Case, LLP
New York, New York
Obstruction of Justice

Synopsis: Recommendation that a new case be opened and assigned to SA [redacted] to investigate the conduct of captioned law firm during the investigation of 318A-LA-220319.

Details: The underlying case, 318A-LA-220319, centered on the investigation of the role of French Bank Credit Lyonnais and others in a scheme to defraud policyholders of defunct California insurer Executive Life Insurance Co. In 1991, Credit Lyonnais acquired Executive Life, along with its junk bond portfolio, through a series of sham transactions that were concealed from U.S. regulatory authorities. At the time, U.S. banking law prohibited a bank from owning a nonbank entity like an insurance company. In addition, California law prohibited a foreign government, or a bank or corporation controlled by a foreign government, from owning an insurance company. Credit Lyonnais and its affiliates purchased Executive Life and its junk bonds anyway, by fraudulently concealing the extent of their interest in the company through the use of shell companies to hide the source of the purchasing funds and make the ownership of the bond portfolio appear to be more widespread than it was.

Credit Lyonnais' CEO at the time of the acquisition of Executive Life and the bond portfolio was [redacted] In November, 1993, [redacted] was dismissed from his position and replaced by [redacted] During the investigation of Credit Lyonnais, it was asserted by Credit Lyonnais and its subsidiary, CDR, that the bank, under [redacted] had reformed itself, and that current management was not involved with and only recently became aware of

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OPEN X CLOSE 7/27/04
ASSIGN TO SA [redacted]
SSA [redacted] DATE 07/27/04

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72-LA-238777-1

[redacted]